



www.VeriSign.com

21355 Ridgetop Cir  
Dulles VA 20166



10 August 2005

Regina Brown  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington DC 20554

Re: [Ex Parte Presentation on 2 Aug 2005 by T-Mobile USA, Inc. in CC Docket No. 95-116](#)

Dear Ms. Brown:

This is in response to the *ex parte* statement filed by T-Mobile, which I just received. In brief, there is no consensus with respect to NANC Change Order 400 to proceed, and no need for immediate action on it. Any attempt by supporters of this change order to create an illusion of critical deadlines for Commission action is without due process or substantive merit. Indeed, approval of Change Order 400 would be significantly harmful to the industry and the public interest.

The record makes clear that companies and organizations representing major industry segments oppose implementation of Change Order 400 on any basis. Contrary to the assertions of both T-Mobile and NeuStar, there are a significant array of major technical, economic, and policy issues surrounding the deployment of IP-enabled Uniform Resource Identifiers (URIs)<sup>1</sup> as part of the North American number portability platform. The global engineering and operational communities have been considering the appropriate means of binding URIs to telephone numbers and securely implementing the associated far reaching capabilities for more than five years in domestic and international bodies. A number of competitive solutions exist in the marketplace. Current IP-enabled Next Generation Network standards work is aimed at an appropriate global technical and operational consensus platform that also supports national critical infrastructure protection and law enforcement needs. An implementation by “slipping” URIs into the NPAC was not contemplated within any of this extensive industry activity and is clearly inappropriate.

VeriSign urges the Commission to hold Change Order in abeyance and proceed with the appropriate mechanism for any far reaching capability of this nature – a rulemaking proceeding combined with industry technical and operational consensus.

---

<sup>1</sup> See T. Berners-Lee et al, *Uniform Resource Identifiers (URI): Generic Syntax*, RFC 2396, Aug 1998.



www.Verisign.com



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anthony M. Rutkowski".

Anthony M. Rutkowski  
Vice President for Regulatory Affairs  
VeriSign Communications Services Div.  
21355 Ridgetop Circle  
Dulles VA 20166-6503  
tel: +1 703.948.4305  
mailto:trutkowski@verisign.com

cc: Marlene H. Dortch, Secretary  
Cheryl Callahan, Wireline Competition Bureau  
Marilyn Jones, Wireline Competition Bureau  
Pam Slipakoff, Wireline Competition Bureau  
Sanford Williams, Wireline Competition Bureau  
Narda Jones, Wireline Competition Bureau  
Walter Johnston, Office of Engineering and Technology